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Attorney for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS

9 ZHAI LAN JIANG,) CASE NO. CV 07-0035
0 Plaintiff,)
1 vs.) NOTICE OF RULE 30(b)(6)
2 HAN NAM CORPORATION, a Commonwealth of) DEPOSITION OF
3 the Northern Mariana Islands corporation,) HAN NAM CORPORATION
4 Defendant.)

**TO: HAN NAM CORPORATION,
and its attorney of record, STEPHEN J. NUTTING**

7 PLEASE TAKE NOTICE that, pursuant to Rules 26, 28 and 30 of the Federal Rules of Civil
8 Procedure, on **Friday, September 5, 2008, at the hour of 1:00 p.m.** at the law office of Mark B.
9 Hanson, Second Floor, Macaranas Building, Beach Road, Garapan, Saipan, Commonwealth of the
10 Northern Mariana Islands, Plaintiff's attorney will take the deposition of Defendant HAN NAM
11 CORPORATION, PMB 385, P.O. Box 10,001, Saipan, MP 96950 ("HAN NAM"), said deposition
12 to continue from day to day until completed. Such deposition will be taken upon oral examination
13 for the purpose of discovery, or as evidence, or both, pursuant to the Federal Rules of Civil
14 Procedure, before the undersigned who will administer the oath and shall be the officer before whom
15 the deposition is taken as that term is used in Fed. R. Civ. P. 28(a).

1 Pursuant to Rule 30(b)(6), HAN NAM shall, as known or reasonably available to it, designate
2 and produce for deposition one or more of the HAN NAM's officers, directors, employees, managing
3 agents, consultants, auditors or other persons who consent to testify on HAN NAM's behalf as to the
4 subject matters identified below for the time period from January 2001 to December 2005 (unless
5 otherwise stated):

6 1. HAN NAM's management structure and decision making processes with regard to human
7 resource decisions;

8 2. HAN NAM's prior and present employment of workers who became pregnant during their
9 employment with HAN NAM;

10 3. HAN NAM's staffing and its staff's specific, daily job duties and responsibilities from
11 January 2004 to December 2005;

12 4. Any disciplinary action taken by HAN NAM, or any of its owners, officers, directors, or
13 employees against Plaintiff for any reason at any time during her employment with HAN NAM,
14 including warning letters, notice of reprimand, suspensions or any other action;

15 5. The names, contract terms, work schedules, pay rate, duties and responsibilities, present
16 whereabouts, if known, and the discoverable information about this case within the knowledge of
17 each of the following HAN NAM employees:

- 18 a. Mary Ann Mercado;
19 b. Mrs. Park's nephew;
20 c. Myrna C. Baliton;
21 d. Carol Lizama;
22 e. Paek Hyun Ho; and
23 f. Azuma.

24 6. All information disclosed in HAN NAM's Initial Disclosures and any supplements thereto
25 up to and including the day of the deposition noticed hereunder including any continuance thereof;
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1 7. All responses of HAN NAM to Plaintiffs' First Interrogatories to HAN NAM dated January
2 25, 2008 and any supplements thereto up to and including the day of the deposition noticed
3 hereunder including any continuance thereof;

4 8. All responses of HAN NAM to Plaintiff's First Request for Production of Documents from
5 HAN NAM dated January 25, 2008 and any supplements thereto up to and including the day of the
6 deposition noticed hereunder including any continuance thereof;

7 9. All responses of HAN NAM to Plaintiff's First Request for Admissions from HAN NAM
8 dated January 25, 2008 and any supplements thereto up to and including the day of the deposition
9 noticed hereunder including any continuance thereof;

10 10. The terms and conditions of Plaintiff's employment with HAN NAM including but not
11 limited to the hiring of Plaintiff, the preparation and execution of Plaintiff's contract of employment
12 and supporting documents and the renewals thereof, the assignment of her job duties and
13 responsibilities, the scheduling of her hours of work, the payment of her salary, the payment of her
14 medical expenses, the supervising of her job performance, the approval of her leave, the discipline
15 of her work deficiencies, and any and all other aspects of Plaintiff's employment with HAN NAM;

16 11. Plaintiff's allegations in her Verified Complaint;

17 12. HAN NAM's Answer to Plaintiff's Verified Complaint and the factual basis for the
18 affirmative defenses contained therein;

19 13. Communications, either written or oral, by and between Plaintiff and HAN NAM, or any
20 of HAN NAM's owners, officers, agents, or employees, at any time between January 2001 and the
21 present, relating to Plaintiff's claims in her Verified Complaint.

22 14. HAN NAM's human resource policies and procedures, including sick leave, maternity
23 leave, vacation leave, salaries, work hours and the assignment of job duties and responsibilities of
24 HAN NAM employees from January 2001 to the present.

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1 Pursuant to the provisions of Fed. R. Civ. Pro. 30(b)(2), you are hereby notified that the
2 deposition shall be recorded by video tape and digital voice recorder rather than stenographic means.

3 You are invited to attend and cross-examine.

4 DATED this 31st day of July, 2008.
5

6 /s/ Mark B. Hanson

7 MARK B. HANSON

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9 Beach Road, Garapan
10 PMB 738 P.O. Box 10,000
Saipan, Mariana Islands 96950
E-Mail Address: mark@saipanlaw.com

11 Attorney for Plaintiff
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1 CERTIFICATE OF SERVICE
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5 I certify that the following were served with a copy of the foregoing via the Court's electronic
6 case filing system (CM/ECF):
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8
9

10 Stephen J. Nutting
11 Attorney at Law
12 Sixth Floor, Marianas Business Plaza
13 P.O. Box 5093
14 Saipan, Mariana Islands 96950
15 Phone: (670) 234-6891
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10 DATED: July 31, 2008

11 /s/ Mark B. Hanson

12 MARK B. HANSON